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Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

**BEST SUNSHINE INTERNATIONAL LTD.
(BVI); IMPERIAL PACIFIC
INTERNATIONAL (CNMI), LLC**

Plaintiffs,

v.

**COMMONWEALTH CASINO
COMMISSION**

Defendant.

CIVIL CASE NO. 1:22cv-00007

**JOINT STIPULATED MOTION TO
STAY BRIEFING ON PLAINTIFFS'
MOTION**

Defendant Commonwealth Casino Commission and Plaintiffs, Best Sunshine International Ltd. (BVI) and Imperial Pacific International (CNMI), LLC, hereby stipulate and agree as follows:

1. Plaintiffs filed their Complaint and Plaintiffs' Emergency Motion for Temporary Restraining Order and Order Compelling Arbitration on May 23, 2022.

1 2. The Court entered a Temporary Restraining Order on May 23, 2022, ordering
2 Defendant to immediately cease and desist from proceeding with Enforcement Action 2021-001-
3 005 (consolidated) including convening the enforcement hearing scheduled for May 24-25, 2022.

4 3. The parties appeared before the Court for a status conference on May 25, 2022. At
5 the status conference, Defendants made a request for enlargement of time to respond to
6 Plaintiffs' Emergency Motion. Following the status conference, the Court entered a minute order
7 extending Defendant's deadline to file its opposition to Plaintiffs' Motion to May 31, 2022 at 12
8 noon, with Plaintiffs' reply due June 2, 2022. The Court also set a show cause hearing for June 6,
9 2022 at 1:30 p.m.

10 4. The parties have made significant progress toward settlement and require
11 additional time to finalize the terms for an agreement in principle and to enter a comprehensive
12 settlement agreement memorializing those terms. In the interest of resolving this matter without
13 proceeding to an order to show cause hearing, the parties desire to stay the briefing schedule
14 entered by this Court.

15 5. The parties agree not to proceed with Enforcement Action 2021-001-005
16 (consolidated) while such stay is in place. The parties further agree that such stay shall remain in
17 place until either (a) the parties notify this Court that efforts to enter a settlement have failed and
18 request that a new briefing schedule and show cause hearing be set by this Court, or (b) Plaintiffs
19 file a motion to dismiss their Complaint and Motion.

20 For the reasons above, the parties respectfully request that further briefings and hearings
21 on Plaintiffs' Motion for Preliminary Injunction in Aid of Arbitration be stayed while the parties
22 continue to work towards settlement.

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Respectfully Submitted,

OFFICE OF THE ATTORNEY GENERAL
KEISHA BLAISE (T0151)
ALISON M. NELSON (T0160)
ATTORNEYS FOR DEFENDANT

/s/
Keisha Blaise (T0151)

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ATTORNEYS FOR PLAINTIFFS

/s/
Joey P. San Nicolas

Dated: May 30, 2022

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing was electronically filed on May 30, 2022 with service requested to all parties of record.

/s/
Keisha Blaise (T0151)
Assistant Attorney General
Attorney for Defendant